



February 2, 2005

Country-of-Origin Labeling Program
Agricultural Marketing Service
1400 Independence Ave. SW
USDA STOP 0249
Washington, D.C. 20250-0249

RE: Docket Number LS-03-04, Mandatory Country-of-Origin Labeling of Fish and Shellfish

Dear Sir:

On behalf of the nearly 300,000 family farm and ranch members of the National Farmers Union (NFU), I am pleased to respond to the Federal Register (Volume 69, Number 192, pages 59708-59746) notice and request for comment on guidelines for implementation of mandatory country-of-origin labeling of fish and shellfish dated October 5, 2004.

The NFU has long supported mandatory country-of-origin labeling (COOL) of agricultural commodities and products as a way to provide consumers with the knowledge to make more informed choices about the products they purchase and to serve as a beneficial marketing tool for U.S. producers. Unfortunately, the interim final rule to exempt an overwhelming amount of U.S. fish products sends a profoundly negative message to our domestic seafood industry, which directly employs more than 250,000 people and contributes about \$40 billion each year to the U.S. economy.

The proposed interim final rule exempts canned and smoked salmon, which are the primary products of Alaska's seafood industry, the largest producer of seafood in the United States. Furthermore, nearly 50 percent of the shrimp purchased by American consumers will not be labeled simply because it is breaded or cooked. The definition of a processed food item exempts an overwhelming amount of seafood products that Congress originally intended to be covered, and I strongly urge you to revise the definition of processed food items in order to reassure both producers and consumers that the intent of the law is being achieved. It is vital to the U.S. seafood, shrimp and salmon industries that the exemptions determined by USDA are not arbitrary, unnecessary or contrary to the intent of Congress.

The interim final rule also reiterates the department's unwillingness to recognize the economic benefits of COOL. The rule supposes that consumers will end up paying 2 cents per person annually for the ability to differentiate between U.S. and imported product and farm-raised and wild-caught seafood products. NFU conducted a poll of likely voters in January 2004, which concluded that 85 percent of respondents would be more inclined to purchase U.S.-origin products and 81 percent would be willing to pay a few cents extra for the information. Certainly the department's estimate would fall into the boundaries of what consumers are willing to pay for this information.

Thank you for the opportunity to respond to this request for comment on the implementation of mandatory country-of-origin labeling of fish and shellfish.

Sincerely,

A handwritten signature in black ink, reading "David J. Frederickson". The signature is fluid and cursive, with the first name "David" being particularly prominent.

David J. Frederickson
President

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